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MEMO ENDORSED

March 9, 2021

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Calle Jara v. Manna 2nd Ave LLC, et al.
1:18-cv-02871-OTW

Dear Judge Wang:

Defendants' request for an extension to file an updated witness list is **GRANTED**. The parties shall still appear for the previously-scheduled pretrial conference on **March 17, 2021 at 3:30 pm**. At the conference, the parties should be prepared to discuss the work still necessary for the case to be trial ready. The parties are directed to order a copy of the March 4, 2020 conference transcript and share the cost.

SO ORDERED.



Ona T. Wang 3/10/21
U.S.M.J.

I represent the Defendants in the above action. I am writing with the consent of counsel for the plaintiff.

In the Court's Order dated March 1, 2021, Your Honor directed the parties to update the joint pretrial order with respect to witnesses. I am seeking a three-week extension of this deadline, for the following reasons. First, due to an incredibly busy mediation schedule in the Eastern District I have been working non-stop and have not had the ability to respond to this Order in the manner that I believe I must. Secondly, some of the witnesses have been unreachable. Their availability is unknown, but I believe that I will be able to reach them soon. My client has just returned from Italy where she was caring for her sick mother.

Essentially, since I anticipate there will be about 12 – 14 witnesses, it will take some dedicated time over the next few weeks to comply with Your Honor's March 1st Order. In light of the above, I respectfully request a three-week extension of time in which to do so.

Respectfully Submitted,

/s/Stephen D. Hans

Stephen D. Hans (SH-0798)

cc: Michael Faillace & Associates, P.C. (via ecf)